

**THE ENGEL LAW GROUP, PLLC**

280 Madison Avenue – Suite 705

New York, NY 10016

Telephone: (212) 665-8095

Email: aee@elgpllc.com

Facsimile: (888) 364-3564

---

April 3, 2023

**BY ECF**

Honorable Jennifer L. Rochon  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *GateGuard, Inc. v. MVI Systems LLC; Samuel Taub; MVI Industries, LLC*  
Case No.: 1:19-cv-02472-JLR-DCF

Dear Judge Rochon:

I represent the Defendants in the above-referenced action, and write today on behalf of the parties to provide their joint status report regarding arbitration.

The parties have agreed to a briefing schedule for the resolution of threshold issues regarding payment of AAA and arbitrator fees, and the potential impact of a provision in the GateGuard Terms of Service regarding past involvement with Airbnb, as follows:

Respondent's (MVI) Brief – April 14.  
Claimant's (GateGuard) Opposition Brief – May 5.  
Respondent's Reply Brief – May 19.  
Claimant's Sur-reply, if necessary – June 2.

The parties will submit further status reports every 45 days as ordered.

Sincerely,



Adam E. Engel  
*Counsel for Defendants*

Cc: All Counsel of Record by ECF